

February 24, 2009 Via ECFS Transmission

2600 Maitland Center Pkwy.

Marlene H. Dortch, Commission Secretary

Office of the Secretary Suite 300

Federal Communications Commission Maitland, FL 32751 445 – 12<sup>th</sup> Street, SW – Suite TW-A325

Washington, D.C. 20554

P.O. Drawer 200 Winter Park, FL

32790-0200

RE: EB Docket No. 06-36

2008 CPNI Certification Filing for Dollar Phone Corp.

Tel: 407-740-8575

Fax: 407-740-0613 www.tminc.com

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Dollar Phone Corp. hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

**Sharon Thomas** 

Consultant to Dollar Phone Corp.

ST/im.

**Enclosure** 

Copy: Enforcement Bureau (2 Copies)

Best Copy and Printing (FCC@BCPIWEB.COM)

Eitan Kimmelman, Dollar Phone Corp.

TMS: FCX0901

File: Dollar Phone Corp – FCC CPNI

## ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Name of company covered by this certification: Dollar Phone Corp.

Form 499 Filer ID: 823792

Name of signatory: Moses Geenfield

Title of signatory: Chief Executive Officer

## I, Moses Geenfield, certify and state that:

- 1. I am the Chief Executive Officer of Dollar Phone Corp. and, acting as an agent of the company, I have personal knowledge of Dollar Phone Corp.'s operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, Dollar Phone Corp.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Moses Greenfield, CEO/

Date

**Exhibit A Statement of CPNI Procedures and Compliance** 

## Dollar Phone Corp.

## Statement of CPNI Procedures and Compliance

Dollar Phone Corp. ("Dollar Phone" or "Company") provides wholesale telecommunications services to other carriers and as such does not have any subscribed service relationship with any business or residential customers. The Company does not obtain, retain or use CPNI for marketing or any other purpose. Although the Company does have call detail records, it does not have any information regarding the calling or called party, and such information is not used for any marketing purposes. Dollar Phone is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and the Company provides for disciplinary action for such violations, up to and including termination of employment.

As a wholesale service provider, Dollar Phone does not market its services to end users. Any marketing efforts would be directed towards other carriers and would not involve the use of CPNI or call detail records.

The Company does not disclose call record information over the telephone.

The Company does not disclose detail records on-line.

The Company does not have any retail locations and therefore does not disclose call detail records instore.

Should Dollar Phone expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

To the extent the Company provides services in the future that involves CPNI or call detail records, the Company will ensure that it establishes procedures to notify law enforcement in the event of a breach of such CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company

would institute a process to record all breaches discovered and to provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company did not have any breaches during 2008.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.